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December 27, 2024

**VIA ECF**

Honorable Dale E. Ho  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Ilyasah Shabazz, et al. v. The United States of America, et al.*,  
No. 24 Civ. 8680 (DEH)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel for the City of New York, and one of the attorneys assigned to represent Defendant City of New York in the above-referenced matter. Defendant City of New York writes to respectfully request an enlargement of time, from Friday December 27, 2024, to and including Tuesday February 11, 2025, to answer or otherwise respond to the Complaint. This is the City's first request for an enlargement of time to respond to the Complaint. Plaintiffs' counsel, Nabeha Shaer, Esq., has indicated Plaintiffs' consent to the requested enlargement. The enlargement is intended to make the City's answer due concurrently with that of the United States.

Plaintiffs served Defendant City of New York with the Summons and Complaint pursuant to Fed. R. Civ. P. 4(j)(2)(B) on December 6 and again on December 13, 2024. *See* Affidavit of Service (ECF No. 19). Considering service on the City effective as of December 9th, the City's response to the Complaint would therefore be due Friday December 27, 2024. Given the age, scope and complexity of the allegations in the Complaint, the City needs additional time to conduct a preliminary investigation and formulate its response. In light of the additional time afforded to the United State to answer or otherwise respond (*see* Fed. R. Civ. P. 12(a)(2), extending the City's time to answer to the requested date is not expected to delay proceedings in the case or prejudice Plaintiffs.

Defendant City of New York thanks the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'TEZ' with a stylized flourish at the end.

Tobias E. Zimmerman

*Senior Counsel*

Special Federal Litigation Division

cc: All Counsel (**via ECF**)